

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ELEANOR and ROCCO CIOFOLETTI, and
LARRY STOSPAL on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

SECURIAN FINANCIAL GROUP, INC.,
MINNESOTA LIFE INSURANCE
COMPANY, SECURIAN LIFE INSURANCE
COMPANY, SHURWEST LLC and
MINNESOTA MUTUAL COMPANIES, INC.,

Defendants.

Civil Action No.: 18-cv-03025-JNE-ECW

DEFENDANT SHURWEST, LLC'S MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rules of Civil Procedure 26(b), Defendant Shurwest, LLC ("Shurwest") moves for a protective order over the deposition of its president, Jim Maschek. This motion is based upon Shurwest's memorandum of law in support of the motion, the exhibits attached thereto, and all files, records, evidence, briefing, or arguments of counsel as may be presented.

[signature page follows]

/s/ Jason M. Hopkins

Brooke D. Anthony (#0387559)

Philip J. Kaplan (#0389351)

ANTHONY OSTLUND

BAER & LOUWAGIE P.A.

3600 Wells Fargo Center

90 South Seventh Street

Minneapolis, Minnesota 55402

Tel: (612) 349-6969

Fax: (612) 349-6996

Email: banthony@anthonyostlund.com

pkaplan@anthonyostlund.com

and

Jason S. Lewis

(Texas No. 24007551 *pro hac vice*)

Jason M. Hopkins

(Texas No. 24059969 *pro hac vice*)

DLA PIPER LLP (US)

1900 N. Pearl St., Ste. 2200

Dallas, Texas 75201

Tel: (214) 743-4500

Fax: (214) 743-4545

Email: jason.lewis@dlapiper.com

jason.hopkins@dlapiper.com

Attorneys for Defendant Shurwest, LLC

CERTIFICATE OF SERVICE

I certify that I served the foregoing motion on all counsel of record on June 11, 2021
via the Court's CM/ECF system.

/s/ Jason M. Hopkins

Jason M. Hopkins